

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**IN RE PAYMENT CARD
INTERCHANGE FEE AND MERCHANT
DISCOUNT ANTITRUST LITIGATION**

Case No. 05-MD-01720-MKB-JO

This Document Applies to:

***Hertz Corp., et al. v. Visa U.S.A. Inc., et al.,*
17-cv-03531-MKB-JO**

STIPULATION AND PROPOSED ORDER

WHEREAS, plaintiffs filed an action captioned *Hertz Corp., et al. v. Visa U.S.A. Inc., et al.*, No. 1:17-cv-00946 (D.D.C.) (the “Hertz Action”);

WHEREAS, on June 13, 2017, the Judicial Panel on Multi-District Litigation transferred the Hertz Action to this Court for pretrial proceedings in MDL 1720, *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, No. 05-md-01720 (E.D.N.Y.), and which action is now individually referenced on this Court’s docket as No. 17-cv-03531-MKB-JO (E.D.N.Y.);

WHEREAS, since the transfer, plaintiffs in the Hertz Action have timely responded to discovery requests and are proceeding to produce documents as promptly as possible;

WHEREAS, the Court has set a fact discovery deadline of April 30, 2018;

WHEREAS, the parties to the Hertz Action seek additional time to allow the defendants to complete fact discovery of the Hertz Action plaintiffs, without altering other case deadlines;
and

WHEREAS, the parties to the Hertz Action seek additional time in which plaintiffs may seek the production of documents related specifically to the plaintiffs in the Hertz Action, without altering other case deadlines.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that:

(a) the deadline for fact discovery of the plaintiffs in the Hertz Action shall be extended to and including June 15, 2018;

(b) the deadline for the plaintiffs in the Hertz Action to seek from defendants written information and documents from existing collections in MDL 1720 or other discrete documents that can be readily located without email searches, and which information and documents relate specifically to the plaintiffs in the Hertz Action, shall be extended to and including June 15, 2018;

(c) all other case deadlines, including without limitation the deadline for fact discovery not otherwise addressed in clause (b) of the defendants in the Hertz Action, shall remain unchanged; and

(d) no party shall use this stipulation and extension of time as a basis to extend any other case deadline, including the deadline to file expert reports.

Dated: February 28, 2018

Respectfully submitted,

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SO ORDERED:

Dated:

Brooklyn, New York

United States District Judge